PIA Analysis Worksheet and Summary Template

The template for an information technology (IT) system Privacy Impact Assessment (PIA) Analysis Worksheet and Summary Template begins on the following page. The Template covers the four major categories of information required for inclusion into the PIA: system characterization, information sharing practices, Web site practices, and security controls.

NASA IT Privacy Impact Assessment (PIA) Analysis Worksheet

The PIA determines what kind of information in identifiable form (IIF), if any, is contained within a system, what is done with that information, and how that information is protected. Systems with IIF are subject to an extensive list of requirements based on privacy laws, regulations, and guidance.

Identifying Numbers (Use N/A for items that are Not Applicable)

Application Name (generally the name that the system is accessed by. www.nasa.gov, when Web enabled,

for example):

NASA Explorer Schools Project Application @

http://www.nsta.org/explorerschools

Application Owner: Rob LaSalvia, NASA Explorer Schools Project Manager (Acting)

Phone Number: (216) 433-8981 E-Mail: robert.f.lasalvia@nasa.gov

(Person who is responsible for

funding)

John Entwistle, NASA Explorer Schools Technology Coordinator

(Responsible for system technical

operation)

System Manager

Phone Number: (202) 358-1614 E-Mail:

John.Entwistle@aesp.nasa.okstate.edu

NASA Cognizant Official: Rob LaSalvia, NASA Explorer Schools Project Manager (Acting)

Phone Number: (216) 433-8981 E-Mail: robert.f.lasalvia@nasa.gov

(NASA individual responsible for management of daily operations)

The purpose of the NASA Explorer Schools (NES) Project Application is to receive information from interested parties to determine annual enrollment, limited to up to 50 schools per year, for the three-year NES project.

Activity/Purpose of Application:

Mission Program/Project Supported:

NASA Explorer Schools project

IT Security Plan Number: CD-999-L-GRC-2181

System Location (Center or contractor Contractor:

office building, room, city, and state): National Science Teachers Association (NSTA)

1840 Wilson Boulevard Arlington, VA 22201

Privacy Act System of Records (SOR) n/a

Number:

OMB Information Collection Approval

Number and Expiration Date:

CMB Control Number 2700-0130

Expiration Date: 11/30/2007

Other Identifying Number(s):

n/a

No.	Privacy Question Sets	Use	er Respo	onse	Comments
		Yes	No	N/A	
	System Chara	cterizati	on and [Data Cate	egorization
1	Has/Have any of the major changes listed in the Comments column occurred to the system since April 2003 or the conduct of the last PIA?				This is an initial PIA.
	If yes, please check which change(s) have occurred.				
2	Does/Will the system contain Federal records?				
3	If the system contains/will contain Federal records, under which disposition authority item in the NASA Records Retention Schedules or the General Records Schedules are/will the records be retained and disposed of or archived?				NRRS, 1/68
4	Do the records in the system pertain to active programs/projects?				
5	Are the records Vital records for the organization?				
6	Are backup files (tapes or other media) being stored off-site? If yes, please indicate in the comment field where backups are located.				Backup storage location: Iron Mountain 8001 Research way Springfield, VA 22153

No.	Privacy Question Sets	Use	er Respo	onse	Comments
		Yes	No	N/A	
	System Chara	cterizati	on and [Data Cate	egorization
7	Does/Will the system contain (store) information in identifiable form (IIF) within any database(s), record(s), file(s) or Web site(s) hosted by this system? Note: If yes, check all that apply in the Comments column. If the category of personal information is not listed, please check "Other" and identify the category. Please note: This question seeks to identify all personal information contained within the system. This includes any IIF, whether or not it is subject to the <i>Privacy Act</i> , whether the individuals are employees, the public, research subjects, or business partners, and whether provided voluntarily or collected by mandate. Later questions will try to understand the character of the data and its applicability to the requirements under the <i>Privacy Act</i> or other legislation. [Autofill all relevant questions with N/A.]				Personal Information: Name Date of birth Social Security Number (or other number originated by a government that specifically identifies an individual) Photographic identifiers (e.g., photograph image, x-rays, and video) Driver's license Biometric identifiers (e.g., fingerprint and voiceprint) Mother's maiden name Vehicle identifiers (e.g., license plates) Mailing address Phone numbers (e.g., phone, fax, and cell) Medical records numbers Medical notes Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN]) Certificates (e.g., birth, death, and marriage) Legal documents or notes (e.g., divorce decree, criminal records, or other) Device identifiers (e.g., pacemaker, hearing aid, or other) Web Uniform Resource Locators (URL) E-mail address Education records Military status and/or records Employment status and/or records Foreign activities and/or interests Other: Citizenship
8	Indicate all the categories of individuals about whom IIF is or will be collected.				

No.	Privacy Question Sets	Use	er Respo	onse	Comments			
		Yes	No	N/A				
	System Chara	cterizati	on and [Data Cate	gorization			
9	Are records on the system (or will records on the system be) retrieved by one or more data elements? Note: If yes, specify in the Comments column data elements will be used in retrieving the records (i.e., using a record number, name, social security number, or other data element or record locator methodology). If the category of personal information is not listed, please check "Other" and identify the category.				Personal Information: Name Social Security Number (or other number originated by a government that specifically identifies an individual) Photographic identifiers (e.g., photograph image, x-rays, and video) Driver's license Biometric identifiers (e.g., fingerprint and voiceprint) Mother's maiden name Vehicle identifiers (e.g., license plates) Mailing address Phone numbers (e.g., phone, fax, and cell) Medical records numbers Medical notes Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN]) Certificates (e.g., birth, death, and marriage) Legal documents or notes (e.g., divorce decree, criminal records, or other) Device identifiers (e.g., pacemaker, hearing aid, or other) Web Uniform Resource Locators (URL) E-mail address Education records Military status and/or records Foreign activities and/or interests Other: Information is retrieved by school name, city, or state.			
10	Are/Will records on 10 or more individuals containing IIF [be] maintained, stored or transmitted/passed through this system?							
11	Is the system (or will it be) subject to the Privacy Act?				Autofill"yes" when yes is marked for 7 and 9; "no," if 7 and 9 are marked "no."			
	Note: If the answer to questions 7, 9, and 10 were yes, the system will likely be subject to the <i>Privacy Act</i> . System owners should contact their Center PAM for assistance with this question if they are uncertain of the applicability of the <i>Privacy Act</i> .							
12	Has a <i>Privacy Act</i> System of Record (SOR) Notice been published in the Federal Register for this system? Note: If no, explain why not in the Comments column.				No IIF is contained in the system. IIF is in the system, but records are not retrieved by IIF. Should have published an SOR, but was unaware of the requirement. System is required to have an SOR but is not yet procured or operational. Other:			
13	If a SOR Notice has been published, have major changes to the system occurred since publication of the SOR?							
	Information Sharing Practices							
14	Is the IIF in the system voluntarily submitted (or will it be)?							

No.	Privacy Question Sets	Use	er Respo	nse	Comments
		Yes	No	N/A	
15	Does/Will the system collect IIF directly from individuals? Note: If yes, identify in the Comments column the IIF the system collects or will collect directly from individuals. If the category of personal information is not listed, please check "Other" and identify the category.				Personal Information: Name Mailing address Phone numbers (e.g., phone, fax, and cell) E-mail address Education records Employment status and/or records Other: Citizenship
16	Does/Will the system collect IIF from other resources (i.e., databases, Web sites, etc.)? Note: If yes, specify the resource(s) and IIF in the Comments column.		×		
17	Does/Will the system populate data for other resources (i.e., do databases, Web sites, or other resources rely on this system's data)? Note: If yes, specify resource(s) and purpose for each instance in the Comments column.				☐ Resource: ☐ Resource: ☐ Resource: ☐ Resource:
18	Does/Will the system share or disclose IIF with agencies external to NASA, or other people or organizations outside NASA? Note: If yes, specify with whom and for what purposes, and identify which data elements in the Comments column. If the category of personal information is not listed, please check "Other" and identify the category.				With whom and for what purposes: NSTA – this NASA grantee collects the data on a server they maintain.

No.	Privacy Question Sets	Use	er Respo	nse	Comments
		Yes	No	N/A	
19	If the IIF in the system is or will be matched against IIF in one or more other computer systems internal or external to NASA, are (or will there be) computer data matching agreement(s) in place? If yes, indicate in the Comments column internal or external and the system(s) with data which are matched.				Location of other systems involved in matching: Internal NASA External to NASA Other systems involved:
20	If data matching activities will occur, will the IIF be de-identified, aggregated, or otherwise made anonymous? Note: If yes, please describe this use in the Comments column.				If answered "No," auto fill 20 with N/A. De-identified Aggregated Other
21	Is there a process, either planned or in place, to notify organizations or systems that are dependent upon the IIF contained in this system when changes occur (i.e., revisions to IIF, when the system encounters a major change, or is replaced)?				
22	Is there a process, either planned or in place, to notify and obtain consent from the individuals whose IIF is in the system when major changes occur to the system (e.g., disclosure and/or data uses have changed since the notice at the time of the original collection)?				
23	Is there/Will there be a process in place for individuals to choose how their IIF data is used? Note: If yes, please describe the process for allowing individuals choice in the Comments column.				A statement explaining how IIF will be used is provided on the data entry page of the application Web site.
24	Is there/Will there be a complaint process in place for individuals who believe their IIF has been inappropriately obtained, used, or disclosed, or that the IIF is inaccurate? Note: If yes, please describe briefly the notification process in the Comments column.				A process in place whereby applicants are provided with an e-mail address to notify NASA if they believe their IIF has been inappropriately obtained, used, or disclosed, or that the IIF is inaccurate.
25	Are there or will there be processes in place for periodic reviews of IIF contained in the system to ensure the data's integrity, availability, accuracy, and relevancy? Note: If yes, please describe briefly the review process in the Comments column.				There is no long-term retention of IIF that would necessitate a periodic review.

No.	Privacy Question Sets	User Response			Comments
		Yes	No	N/A	
26	Are there/Will there be rules of conduct in place for access to IIF on the system? Note: If yes, identify in the Comments column all users with access to IIF on the system and for what purposes they use the IIF.				☑ Users☑ NES project administrators☑ System Administrator
					For what purposes: Users – Voluntary completion of the online application NES project administrators - NES applicant selection System Administrator system administration, create backups and archives
27	Is there a process in place to log routine and non-routine disclosures and/or unauthorized access? If yes, check in the Comments column which kind of disclosures are logged.				Disclosures logged: Routine Non-routine Public Internet
			_		
28	Does/Will the system host a Web site?	site Hos	st – Que	stion Se	ts Type of site:
25	Note: If yes, identify what type of site the system hosts in the Comments column. If no, check "No" for all remaining questions in the "Web Site Host Question Sets" section and answer questions starting with the "Administrative Controls" section beginning				☐ Public Internet ☐ Internal NASA ☐ Both ☐
29	with question 42. Is the Web site (or will it be) accessible by the public or other entities (i.e., federal, state, and local agencies, contractors, third-party administrators, etc.)?				
30	Is the Agency Web site privacy policy statement posted (or will it be posted) on the Web site?				The Agency privacy policy is accessible from the application Web site.
31	Is the Web site's privacy policy in machine-readable format, such as Platform for Privacy Preferences (P3P)?				
	Note: If no, please describe in the Comments column your timeline to implement P3P requirements for this system.				

No.	Privacy Question Sets	Use	er Resp	onse	Comments
		Yes	No	N/A	
32	Does the Web site employ (or will it employ) persistent tracking technologies? Note: If yes, identify types of cookies in the Comments column. If persistent tracking technologies are in place, please indicate the official who authorized the use of the persistent tracking technology.				☐ Session Cookies ☐ Persistent Cookies ☐ Web bugs ☐ Web beacons ☐ Other (Describe):
33	Does/Will the Web site collect or maintain personal information from or about children under the age of 13?				Authorizing Date: If marked "No," autofill "N/A" in next question.
34	If the Web site does/will collect or maintain personal information from or about children under the age of 13, please indicate what information and how the information is collected.				☐ Actively directly from the child ☐ Passively through cookies ☐ Both of the above What Information collected: ————————————————————————————————————
35	If the Web site does/will collect or maintain personal information from or about children under the age of 13, is the information shared with any non-NASA organizations, grantees, universities, etc. Note: If yes, also identify the non-NASA organizations in the comments field				Personal information from or about children under the age of 13 is not collected. If "no," autofill "N/A" in items 36 & 37.
36	If the Web site does/will collect or maintain personal information from or about children under the age of 13, specify in the comments field what method is used for obtaining parental consent.				Method used for obtaining parental consent (please check all that apply) No consent is obtained Simple email email accompanied by digital signature signed form from the parent via postal mail or facsimile accepting and verifying a credit card number in connection with a transaction taking calls from parents, through a toll-free telephone number staffed by trained personnel

No.	Privacy Question Sets	Use	er Respo	nse	Comments
		Yes	No	N/A	
37	Does/Will the Web site collect IIF electronically from any individuals? Note: If yes, identify what IIF the system collects in the Comments column. If the category of personal information is not listed, please check "Other" and identify the category.				Personal Information: Name Date of birth Social Security Number (or other number originated by a government that specifically identifies an individual) Photographic identifiers (e.g., photograph image, x-rays, and video) Driver's license Biometric identifiers (e.g., fingerprint and voiceprint) Mother's maiden name Vehicle identifiers (e.g., license plates) Mailing address Phone numbers (e.g., phone, fax, and cell) Medical records numbers Medical notes Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN]) Certificates (e.g., birth, death, and marriage) Legal documents or notes (e.g., divorce decree, criminal records, or other) Device identifiers (e.g., pacemaker, hearing aid, or other) Web Uniform Resource Locators (URL) E-mail address Education records Military status and/or records Employment status and/or records Foreign activities and/or interests Other: U.S. Citizenship
38	Does/Will the Web site provide a PDF form to be completed with IIF from any individuals and then mailed or otherwise provided to NASA? Note: If yes, identify what IIF the PDF form collects in the Comments column. If the category of personal information is not listed, please check "Other" and identify the category.				
39	Does/Will the Web site share IIF with organizations external to NASA, or other people or organizations outside NASA? Note: If yes, specify with whom and for what purposes.	×			With whom and for what purposes: NSTA – this NASA grantee collects the data on a server they maintain

No.	Privacy Question Sets	User Response			Comments
		Yes	No	N/A	
40	Are rules of conduct in place (or will they be in place) for access to IIF on the Web site? Note: If yes, identify in the Comments column all categories of users with access to IIF on the system, and for what purposes the IIF is used.				☐ Users ☐ NES project administrators ☐ System Administrator For what purposes: ☐ Users – Voluntary completion of the online application ☐ NES project administrators - NES applicant selection ☐ System Administrator system administration, backups, archival ☐
41	Does (or will) the Web site contain links to sites external to the Center that owns and/or operates the system?				☐ Disclaimer notice for all external links
	Note: If yes, note in the Comments column whether the system provides a disclaimer notice for users that follow external links to Web sites not owned or operated by the Center.	dminist	rative Co	ontrols	
42	Have there been major changes to the				
	system since it was last certified and accredited? Note: If the system is under development and not yet certified and accredited at the time of this PIA, please describe in the Comments column the plan and timeline for conducting a certification and accreditation (C&A) for this system.				
43	Have personnel (system owners, managers, operators, contractors and/or program managers) using the system been (or will they be) trained and made aware of their responsibilities for protecting the IIF being collected and maintained?				
44	Who has /will have access to the IIF on the system? Note: Check all that apply in the Comments column.				 ☑ Users – have access to their own information via a valid login and password. ☑ Administrators ☐ Developers ☐ Contractors ☐ Other
45	If contractors operate or use the system, do the contracts include clauses ensuring adherence to privacy provisions and practices?				

No.	Privacy Question Sets	Use	er Respo	onse	Comments
		Yes	No	N/A	
46	Are methods in place to ensure that access to IIF is restricted to only those required to perform their official duties? Note: If yes, please specify method(s) in the				IIF is accessible only by authorized individuals with a valid user name and password.
	Comments column.				Records will be maintained in accordance with
47	Are there policies or guidelines in place for the retention and destruction of IIF within the application/system? Note: If yes, please provide some detail about these policies/practices in the Comments column.				Schedule 1, Item 68, Educational Programs.
		Techni	cal Con	rols	
48	Are technical controls in place to minimize the possibility of unauthorized access, use, or dissemination of the data in the system (or will there be)?				IIF is accessible only by authorized individuals with a valid user name and password.
49	Are any of the password controls listed in the Comments column in place (or will they be)? Note: Check all that apply in the Comments column.	⊠			 ☑ Passwords expire after a set period of time. ☐ Accounts are locked after a set period of inactivity. ☑ Minimum length of passwords is eight characters. ☐ Passwords must be a combination of uppercase, lowercase, and special characters. ☐ Accounts are locked after a set number of incorrect attempts.
50	Is there (or will there be) a process in place to monitor and respond to privacy and/or security incidents?				
		Physic	al Cont	rols	1
51	Are physical access controls in place (or will they be)				
	1	_	END -	I	1

PIA Analysis Worksheet Contact Information

Signature of NASA Cognizant C	fficial	Date
Robert F. LaSalvia		NASA Explorer Schools Project Manage.
Print Name		Title/Position
Glenn Research Center, GRC:XN	<u>00</u>	
Center and Office/Department		
MS 7-4		
Street Address		
Cleveland, OH 44135		
City, State and Zip Code		
<u>(216) 433-8981</u>	<u>(216) 433-3344</u>	
Phone Number	Fax Number	

^{***}Please go to the next page and complete the PIA Summary. This Summary will be made publicly available at http://www.NASA.gov/pia.***

Privacy Impact Assessment (PIA) Summary

Date of this Submission (MM/DD/YYYY):

April 4, 2007

NASA Center:

Glenn Research Center

Application Name:

Rob LaSalvia

Is this application or information collection new or is an existing one being modified?

New data collection

Does this application collect, maintain, and/or disseminate information in identifiable form (IIF)?

Contact information for potential respondent population is in identifiable form (IIF).

Mission Program/Project Supported:

NASA Explorer Schools project

Identifying Numbers (Use N/A, where appropriate)

Privacy Act System of Records Number: n/a

OMB Information Collection Approval Number and Expiration Date:

Other Identifying Number(s):

Description

1. Provide an overview of the application or collection and indicate the legislation authorizing this activity.

The application facilitates the annual collection of information needed for selection of NASA Explorer Schools (NES) across the United States. The three-year NES project promotes and supports the use of NASA content, missions, and opportunities to support school improvement plans in science, mathematics, and technology education.

The NES project is one NASA initiative to achieve the educational outcomes as directed by the Space Act of 1958, the Vision for Space Exploration, NASA's Education Strategic Coordination Framework as well as the Strategic Management of Human Capital initiative under the President's Management Agenda.

Describe the information the agency will collect, maintain, or disseminate and how the agency will use the information. In this description, indicate whether the information contains IIF and whether submission is voluntary or mandatory.

The system collects and uses the following information:

- Name (IIF-Voluntary) used to identify the teacher completing the application on behalf of their school or school system as well as other team members. Failure to provide data may impair a schools ability to qualify for enrollment in the NES project.
- Mailing Address (IIF-Voluntary) used to send project-related material to participants. Failure to provide data may impair a school's ability to qualify for enrollment in the NES project.
- Phone Numbers (IIF-Voluntary) used to conduct phone interviews during the selection process. Failure
 to provide data may impair a school's ability to qualify for enrollment in the NES project.
- E-mail Address (IIF-Voluntary) used to contact applicants as may be needed during the selection
 process or to send project-related materials. Failure to provide data may impair a school's ability to qualify
 for enrollment in the NES project.
- Education Records (IIF-Voluntary) used to verify that team members are academically eligible to
 participate in the program. Failure to provide data may impair a school's ability to qualify for enrollment in
 the NES project.
- Employment Records (IIF-Voluntary) used to ensure that team members have the desired level of teaching experience to participate in the program. Failure to provide data may impair a school's ability to qualify for enrollment in the NES project.

Explain how the IIF collected, maintained, and/or disseminated is the <u>minimum</u> necessary to accomplish the purpose for this effort.

Each element of information collected is necessary to determine whether NES applicants meet the criteria necessary for probable project success.

4. Explain why the IIF is being collected, maintained, or disseminated.

Information collected is necessary to determine which applicants should be selected to participate in the three-year NES project.

5. Identify with whom the agency will share the IIF.

As the system host for the online Web site form, NSTA, a NASA grantee, will have access to the IIF.

6. Describe how the IIF will be obtained, from whom it will be collected, what the suppliers of information and the subjects will be told about the information collection, and how this message will be conveyed to them (e.g., written notice, electronic notice if a Web-based collection, etc.). Describe any opportunities for consent provided to individuals regarding what information is collected and how the information will be shared.

The IIF is obtained through an online Web site form hosted by a NASA grantee, the National Science Teachers Association (NSTA). Educators and administrators voluntarily apply for participation in the NASA Explorers Schools project. A notice of consent is provided on the Web site. Also, NASA's Privacy Policy is accessible from the application Web site. A notice indicating how the educator's IIF will be used during the school team selection process is also posted on the Web site.

State whether personal information will be collected from children under age 13 on the Internet and, if so, how
parental or guardian approval will be obtained. (Reference: Children's Online Privacy Protection Act of 1998)

Neither NSTA nor NES will collect information from children under age 13 on the Internet.

Describe how the IIF will be secured.

Access to IIF is secured via an assigned user ID and password-protected connection.

9. Describe plans for retention and destruction of IIF.

IIF will be maintained per the direction of Schedule 1, Item 68, Educational Programs, of the NASA Records Retention Schedules or the General Records Schedules.

10. Identify whether a system of records is being created under section 552a of Title 5, United States Code (the *Privacy Act*), or identify the existing Privacy Act system of records notice under which the records will be maintained.

The system is not subject to the Privacy Act therefore a system of records is not applicable.

11. Identify a point of contact to whom a member of the public can address questions concerning this information system and the privacy concerns associated with it: Robert F. LaSalvia at (216) 433-8981.

Robert F. LaSalvia	
NES Project Manager	
Date:	
Concur:	Concur:
Sandra Nagy	 Sasi K. Pillay
Center Privacy Act Manager	Center Chief Information Officer
Date	Date:
Concur:	Approved for Publication:
Patti F. Stockman	
NASA Privacy Act Officer	Chief Information Officer
Date:	Date: